



Signed and Filed: August 31, 2020

DENNIS MONTALI
U.S. Bankruptcy Judge

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION PERMITTING
FRANK DODINI AND THE
DODINI REVOCABLE LIVING
TRUST TO AMEND
PREVIOUSLY FILED PROOF OF
CLAIM**

1 The Court having considered the *Stipulation Permitting Frank Dodini and the Dodini*
2 *Revocable Living Trust to Amend Previously Filed Proof of Claim*, dated August 27, 2020 [Dkt.
3 No. 8874] (the “**Stipulation**”),¹ entered into by PG&E Corporation (“**PG&E Corp.**”) and Pacific
4 Gas and Electric Company (the “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and
5 as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned cases
6 (the “**Chapter 11 Cases**”), on the one hand, and Frank Dodini and the Dodini Revocable Living
7 Trust (“**Movants**”), on the other hand; and pursuant to such Stipulation and agreement of the
8 Parties, and good cause appearing,

9 IT IS HEREBY ORDERED THAT:

10 1. The Stipulation is approved.
11 2. Movants are permitted to file a proof of claim (the “**Second Amended Proof of**
12 **Claim**” and, together with the Original Proof of Claim and the First Amended Proof of Claim, the
13 “**Proofs of Claim**”) amending the First Amended Proof of Claim, solely to add the Dodini
14 Revocable Living Trust as an additional claimant, on the condition that the Second Amended
15 Proof of Claim shall be filed no later than seven (7) days after the entry of any Order approving
16 the terms of this Stipulation.

17 3. The Proofs of Claim and the Asserted Fire Victim Claims shall for all purposes be
18 treated and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the
19 sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be
20 administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in
21 accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution
22 Procedures. Movants shall have no further recourse against the Debtors or Reorganized Debtors,
23 as applicable, with respect to the Proofs of Claim or the Asserted Fire Victim Claims.

24 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
25 Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to

26
27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than the untimely
2 filing thereof.

3 5. Nothing herein shall be construed to be a waiver by Movants of their rights to assert
4 any right in contravention to or in opposition of any asserted challenge to the Asserted Fire Victim
5 Claims or the Proofs of Claim.

6 6. Upon the timely filing of the Second Amended Proof of Claim pursuant to paragraph
7 2 of this Order, the Original Proof of Claim and the First Amended Proof of Claim shall be deemed
8 expunged, and Prime Clerk LLC, the claims agent appointed in the Chapter 11 Cases, shall be
9 authorized to update the official claims register to reflect the terms set forth herein.

10 7. The Motion is deemed withdrawn with prejudice, and the Hearing vacated.

11 8. The Stipulation is binding on the Parties and each of their successors in interest.

12 9. The Stipulation constitutes the entire agreement and understanding of the Parties
13 relating to the subject matter hereof and supersedes all prior agreements and understandings relating
14 to the subject matter thereof.

15 10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
16 controversies arising from this Order or the Stipulation.

17 *** END OF ORDER ***

18 Dated: August 27, 2020

19
20 DOWNEY BRAND LLP

21
22 /s/ Jamie P. Dreher
Jamie P. Dreher, Esq.

23 *Attorneys for Frank Dodini and the Dodini*
24 *Revocable Living Trust*